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5
6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

7 **IN AND FOR THE COUNTY OF YAVAPAI**

8 **STATE OF ARIZONA,**

9 Plaintiff,

10 vs.

11 **STEVEN CARROLL DEMOCKER,**

12 Defendant.
13
14

CAUSE NO. P1300CR201001325

**STATE'S REQUEST FOR PHYSICAL
EVIDENCE**

EXPEDITED RULING REQUESTED

Assigned to Hon. Gary Donahoe

15 The State of Arizona, by and through undersigned counsel, requests that this Court,
16 pursuant to Rule 15.2(a)(7), Arizona Rules of Criminal Procedure, issue the proposed order for
17 the taking of specimens of the Defendant's handwriting.

18 There are a number of documents purportedly written and or signed by the Defendant in
19 this case. The State intends to introduce expert testimony, if necessary, to prove that the
20 Defendant wrote and/or signed these documents. Given the Court's recent ruling on the State's
21 Motion Pursuant to Rule 15.3 for Deposition of Witness John Sears, such expert testimony may
22 be necessary to establish foundation for these documents.
23

24 WHEREFORE, the State of Arizona respectfully requests that the Court order Defendant
25 to permit the taking of his handwriting specimens by members of the Yavapai County Sheriff
26 Office, the Yavapai County Attorney's Office and/or the State's handwriting expert, John Hale, at

Office of the Yavapai County Attorney

255 E. Gurley Street, Suite 300

Prescott, AZ 86301

Phone: (928) 771-3344 Facsimile: (928) 771-3110

1 the Yavapai County Jail or Sheriff's Department, at a time to be arranged with such personnel.

2 Such samples will be taken during regular business hours between 8:00 a.m. and 5:00 p.m.,

3 Monday through Friday, and the Defendant's counsel, Craig Williams and Greg Parzych, shall be

4 notified 24 hours in advance of taking of the samples in order to allow them to be present for the

5 taking of the evidence.

6 **RESPECTFULLY SUBMITTED** this 4 day of January, 2012.

8 **Sheila Sullivan Polk**

YAVAPAI COUNTY ATTORNEY

10 By: Steven A. Young

Steven A. Young

Deputy County Attorney

12 **COPY** of the foregoing **Emailed** this

13 _____ day of January, 2012, to:

14 Honorable Gary Donahoe

15 Division 1

Yavapai County Superior Court

16 Via email to gdonahoel@courts.az.gov

And a hardcopy sent to Division 1

18 Craig Williams

Attorney for Defendant

19 P.O Box 26692

Prescott Valley, AZ 86312

20 Via email to craigwilliamslaw@gmail.com

21 Greg Parzych

Co-counsel for Defendant

22 2340 W. Ray Rd., Suite #1

Chandler, AZ 85224

23 Via email to: gparzlaw@aol.com

25 By: R. Shubb

26